

Rock Springs AO Responses Stephanie Gieck to: Randy Conner

Hi Randy,

I'm glad we got a chance to discuss the AO in person last week. I've reviewed all of the information submitted so far in response to the 3/8/11 AO. I wanted to clarify some information over email before I send a formal written response from EPA.

Response dated 4/11/11:

- 1. You asked for clarification on the self-monitoring report due date for Sweetwater County Memorial Hospital. You indicated that one of the reports EPA noted as being late was due on April 10, 2009, which was a City holiday (Good Friday). The report was submitted on April 13, 2009, the next City business day. If the City wishes to allow reports due on a City holiday to be submitted on the next business day, this must be included in the permit. The permit required the report to be submitted by April 10, 2009, and EPA found no exception in the permit for a later due date. As such, the report was late. If there was a provision in the permit that we missed allowing reports to be submitted on a later date due to City holidays or weekends, please provide me that language. Otherwise, the report was late and there was a violation.
- 2. FTEs The response includes the job descriptions performed by Rock Springs personnel. However, I did not see any pretreatment tasks listed in the description for Collections Worker I and II, and the response letter did not provide this information either. Please provide a list of pretreatment duties performed by the Collections Workers (i.e. any IU sampling, inspections, etc.).

Response/Quarterly Report dated 4/20/11:

3. The sampling data submitted for samples taken by the City on 3/2/11 at Terracon RS-8 showed a beryllium result of 0.250 mg/L. The permit limit is 0.043 mg/L. Has the City taken any enforcement action against Terracon RS-8 for this violation?

Thanks,

Stephanie Gieck

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